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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE IN
SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

1 I, Brian J. Dunne, declare and state as follows:

- 2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am an attorney at Bathaee Dunne
4 LLP, Interim Co-Lead Counsel for the Advertiser Plaintiffs in the above-captioned
5 matter. I have personal knowledge of the facts set forth herein and, if called as a witness,
6 could and would testify competently to them.
- 7 2. This declaration is made in support of Advertiser Plaintiffs' Administrative Motion to
8 Consider Whether Another Party's Material Should Be Sealed, filed in connection with
9 the concurrently filed Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss the
10 First Amended Consolidated Advertiser Class Action Complaint ("Opposition").
- 11 3. Certain documents and information referenced in the Opposition have been designated
12 by Defendant Meta Platforms, Inc., as "Confidential" or "Highly Confidential" under
13 the Stipulated Protective Order (Dkt. No. 111).
- 14 4. Portions of the Opposition referencing or reflecting the contents of the documents and
15 information designated by Meta Platforms as "Confidential" or "Highly Confidential"
16 have been redacted from the publicly filed version of the Opposition. *See* Civil L.R. 79-
17 5(e)(1).
- 18 5. An unredacted version of the Opposition with these references highlighted is filed
19 herewith. *See* Civil L.R. 79-5(e)(2), (f)(1).
- 20 6. Advertiser Plaintiffs' request is limited to documents and information produced by Meta
21 Platforms marked Confidential or Highly Confidential, or information directly reflecting
22 documents and information produced by Meta Platforms marked Confidential or Highly
23 Confidential. This request is thus narrowly tailored to seek sealing only of potentially
24 sealable material.

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed on April 11, 2022, in Pasadena, California.

27 s/ Brian J. Dunne

28 Brian J. Dunne